

December 20, 1996

Laura Bose, Chief
Ground Water Office
US Environmental Protection Agency
Region IX
Mail Code WTR-9
75 Hawthorne Street
San Francisco, CA 94105-3901

ATTN: Gregg Olson

Dear Ms. Bose:

Thank you for providing us with a copy of the report by Western Cultural Resource Management, Inc. (WCRM) that is entitled *National Register of Historic Places Eligibility Testing of 14 Sites at BHP Copper's Florence In-Situ Copper Mine, Pinal County, Arizona*. Pursuant to the Memorandum of Agreement for this project, I have reviewed the document (which we view as a **draft** report) and have the following comments:

1. If you have not done so already, please send a copy of this draft report to the tribes that are a signatory to this agreement so that they can review and comment on the eligibility discussions contained within.
2. With regard to any sites that are situated on State Trust Land, our office needs to be consulted by Ken Rozen, Archaeologist for the Arizona State Land Department (ASLD), prior to finalizing eligibility determinations for those sites. (Please note that it is not clear in the report if any of the subject sites are located on state land; if any are, please have WCRM clarify this in the report.)
3. The report discusses eligibility testing at 15 sites (two of which will be tested during data recovery investigations due to agricultural crop cover). Thus, it is not clear why the report titles indicates "14" sites? Please have the archaeological consultant clarify this apparent discrepancy.
4. We concur with the eligibility assessments for all of the 13 sites that were tested. With regard to the three sites (AZ U:15:283, 284, and 288[ASM]) that have been recommended as not eligible, we also concur with those evaluations. We agree that as testing has realized their information potential; based upon the testing program, these three sites do not appear to have any likelihood of subsurface remains and the testing program adequately documented their surface manifestations. However, we add the caveat that the canals identified at AZ U:15:288(ASM) DO have research potential and should be investigated further during data recovery at the canals in the project area, as suggested by WCRM on page 95.
5. We also concur that archaeological monitoring of construction activities at the plant site would be a good idea, given the heavily disturbed nature of this parcel of land and the obstructions that were encountered during testing of this area.
6. The geomorphological reconnaissance of the project area is well-reported in Chapter 3. This information is extremely useful in assessing the the geological history of the area and how it may have affected the distribution and visibility of prehistoric use of the area. We agree that, in addition to the five future geoarchaeological studies that are recommended for the area (see page 139), the microstratigraphy of the canals in the project area needs to be examined in detail in order to better understand the operation and maintenance of the prehistoric canal system. We also agree that additional trenches need to be cut in order to search for lateral canals extending from the main canals so that, hopefully, these laterals can

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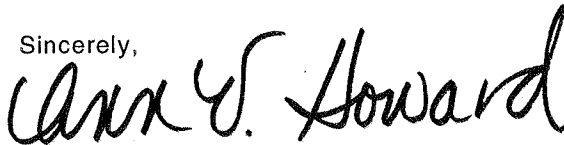
be traced to the field areas.

7. We appreciate the additional historic archival research which was conducted at the three historic sites in the project area, as per our request. We agree that this information should be appended to the Class III survey report. Based upon this additional research, we concur that these three sites are not eligible for the National Register of Historic Places.

8. Finally, on page 152 it is stated that "additional documentation of the distribution of prehistoric canals in the project area will be a major component of any future investigations..." We agree with this statement, but want to make it clear that the canal investigations should do more than just "document their distribution" across the project area. We recommend that, in order to recognize the research potential of these features for understanding the prehistoric cultural development and land use in this portion of the Middle Gila River Valley, a paleohydrological study of the canals (see Ackerly and Henderson 1989; Graybill et al. 1989; J. Howard 1990, 1993; Masse 1987; Greenwald and Ciolek-Torrello 1988) needs to be part of this investigation. (If WCRM staff need these references, I will be happy to supply them.)

We appreciate your continued cooperation with this office in complying with the historic preservation requirements for federally licensed undertakings. If you have any questions or concerns, please contact me at 602/542-7138.

Sincerely,

A handwritten signature in black ink that reads "Ann V. Howard". The signature is written in a cursive, flowing style.

Ann Valdo Howard
Public Archaeology Programs Manager/Archaeologist
State Historic Preservation Office

c: Ken Rozen, ASLD
Tom Lennon, WCRM